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June 5, 2025

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## **VIA ECF**

Hon. Stewart D. Aaron United States District Court Southern District of New York 500 Pearl Street, Room 1970 New York, New York 10007

Re: Yelitza Picon v. Central Park West Dentistry, P.C.

Civil Action No. 1:25-cv-01524-DEH-SDA

RR File No. 015709-00001

## Dear Honorable Stewart Aaron:

This office represents Defendant Central Park West Dentistry, P.C. ("Defendant") in the above-referenced matter. We write to request an extension of Defendant's time to respond to the putative class action complaint from June 5, 2025, through July 11, 2025. This application is made in compliance with Section 1(C) of Your Honor's Individual Practices.

On April 7, 2025, Defendant submitted a letter motion, with the consent of Gabriel A. Levy of Gabriel A. Levy, P.C., counsel to Plaintiff Yelitza Picon ("Plaintiff"), seeking an extension of time to respond to the putative class action complaint through June 5, 2025. See ECF Document No. 10. On April 8, 2025, Your Honor granted the request. See ECF Document No. 11. The present request for an extension is being made as the parties have made significant progress in settlement discussion and need additional to come to an agreement in principle, as well as prepare the settlement documents. This request is being made with the consent of Mr. Levy. Based on our review of the docket, there are no scheduled conferences or other court deadlines that would be affected by the present request.

## RIVKIN RADLER LLP

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Accordingly, we respectfully request that this Court grant Defendant's application to extend Defendant's time to respond to the Complaint through July 11, 2025, by "So Ordering" this letter in the space provided below. We are, of course, available to discuss the matter at the Court's convenience.

We thank the Court for its attention to this matter.

Respectfully submitted,

RIVKIN RADLER LLP

/ s Lawrence S. Han

CC: All counsel of record via ECF

SO ORDERED:

Defendant shall respond to the Complaint no later than July 11, 2025.

Hon. Stewart D. Aaron Dated: June 5, 2025

4897-0230-5355, v. 1